

**FILED**  
Clerk  
District Court

**MAR - 4 2008**

**For The Northern Mariana Islands**  
**By** \_\_\_\_\_  
**(Deputy Clerk)**

1 STEPHEN J. NUTTING, ESQ.  
2 Post Office Box 5093  
3 Saipan, MP 96950  
4 Telephone: (670) 234-6891  
5 Facsimile: (670) 234-6893

6 Attorney for Defendant Han Nam Corporation

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE  
10 NORTHERN MARIANA ISLANDS  
11

12 ZHAI LAN JIANG,

13 Plaintiff,

14 -v-

15 HAN NAM CORPORATION,

16 Defendant.

CIVIL ACTION NO. CV-07-0035

17 DEFENDANT'S RESPONSE TO PLAINTIFF'S  
18 FIRST SET OF INTERROGATORIES

19 COMES NOW the defendant Han Nam Corporation to respond to Plaintiff's First Set of  
20 Interrogatories as follows:  
21

22 **INTERROGATORY NUMBER 1:** Please state the total number of EMPLOYEES  
23 EMPLOYED by YOU on the following dates:  
24

- 25 a) December 8, 2004;  
26 b) November 16, 2007; and  
27 c) The date of YOUR response to these Interrogatories.  
28

**Response:**

- 29 a) Approximately 22 see exhibit 1.  
30 b) Approximately 20 see exhibit 2.  
31 c) Approximately 20 see exhibit 3.

1 **INTERROGATORY NUMBER 2:** Please IDENTIFY all PERSONS, regardless of job title  
2 or category, who have become pregnant while EMPLOYED by YOU.

3 **Response:**

- 4
- 5 1) Carol Lizama  
6 Tun Saldon Road, San Antonio  
7 Saipan, MP 96950  
8  
9 Tel: 235-0950  
10  
11 2) Mary Ann Mercado  
12 Address Unknown  
13 Last Known Tel: 235-8570  
14  
15 3) Zhai Lan Jiang  
16 Address and Telephone # Unknown  
17  
18  
19

20 **INTERROGATORY NUMBER 3:** Please IDENTIFY all PERSONS IDENTIFIED by YOU  
21 in response to Interrogatory Number 2 who are no longer EMPLOYED by YOU and state: (a) the  
22 date of their separation from EMPLOYMENT; (b) the reason(s) for their separation from  
23 EMPLOYMENT; and (c) the current whereabouts of all such PERSONS.  
24

25 **Response:**

- 26 1) Carol Lizama remains employed by Han Nam  
27  
28 2) Mary Ann Mercado transferred to another employer. She remains on Saipan  
and can be reached at the above listed number.  
3) Zhai Lan Jiang abandoned her employment on December, 2004. The reason for  
the abandonment of her employment is unknown. Her present whereabouts are  
unknown.

1 **INTERROGATORY NUMBER 4:** Please DESCRIBE IN DETAIL all of the  
2 ACCOMMODATIONS YOU made for any PERSON IDENTIFIED in Interrogatory Number 2  
3 above which ACCOMMODATIONS, if any, were made by YOU when the PERSON was pregnant  
4 while EMPLOYED by you.  
5

6 **Response:** Pregnant employee were given light duty tasks which did not involve lifting or  
7 strenuous physical activity. They were allowed to rest as necessary and given leave when they did  
8 not feel well enough to come to work.  
9

10  
11 **INTERROGATORY NUMBER 5:** Please DESCRIBE IN DETAIL all of the  
12 ACCOMMODATIONS YOU made for PLAINTIFF when she became pregnant while  
13 EMPLOYED by YOU.  
14

15 **Response:** Plaintiff was given light duty tasks which did not involve lifting or strenuous  
16 physical activity. She was allowed to rest as necessary and given leave when she did not feel well  
17 enough to come to work.  
18

19  
20 **INTERROGATORY NUMBER 6:** Please DESCRIBE IN DETAIL why YOU contend that  
21 PLAINTIFF did not adequately perform her job with YOU as she alleged in ¶ 27 of her Complaint  
22 filed on November 16, 2007.  
23

24  
25 **Response:** After being notified that her contract would not be renewed, Plaintiff  
26 abandoned her employment, did not return to work, and failed to complete her contract with  
27 plaintiff.  
28

1  
2 **INTERROGATORY NUMBER 7:** To the extent not included in YOUR Response above,  
3  
4 please STATE ANY AND ALL FACTS that support YOUR contention that PLAINTIFF did not  
5 adequately perform her job with YOU as she alleged in ¶ 27 of her Complaint filed on November  
6 16, 2007.

7 **Response:** See Answer to Interrogatory No. 6.  
8  
9

10 **INTERROGATORY NUMBER 8:** Please state ANY AND ALL FACTS that led to YOUR  
11 decision not to renew PLAINTIFF'S EMPLOYMENT with YOU on January 3, 2005.

12 **Response:** Han Nam operates a large market/department store on the southern end of  
13 Saipan. The market has been in operation since 1996. Sometime in 2001, Han Nam decided to  
14 expand its retail operations to include clothing and other garments. Ms. Jiang was hired to work  
15 in the Garment Section and was retained to make alterations and repairs to garments that were  
16 sold from the premises. Because the apparel division was not profitable, Han Nam decided to  
17 discontinue this line of operation in 2004. At that time, there were two employees working in  
18 the apparel department, they were both promptly notified of this decision. One of the  
19 employees transferred to a new employer, and the second was Ms. Jiang. Because of her  
20 pregnancy, Han Nam offered to extend her contract temporarily to allow her to find work.  
21 Rather than accept this proposal, Ms. Jiang chose to abandon her employment and to pursue a  
22 claim for discrimination with the EEOC.  
23  
24  
25  
26  
27

28 **INTERROGATORY NUMBER 9:** Please IDENTIFY all EMPLOYEES  
EMPLOYED by YOU after December 28, 2004 that were not EMPLOYED by YOU on or before

1 December 8, 2004 and provided: (a) the date of hire of each such person EMPLOYED, (b) the  
2 nationality of each such person EMPLOYED, and (c) a job description of the actual job or jobs  
3 performed for each such person while EMPLOYED by YOU.  
4

5 **Response:** Objection request is overly broad, vague and burdensome. Notwithstanding this  
6 objection please see the list of employees attached as Exhibit 4 which lists the employees their job  
7 category and citizenship and the approximate date of hire.  
8  
9

10 **INTERROGATORY NUMBER 10:** Please DESCRIBE IN DETAIL all of the various job  
11 duties and responsibilities of PLAINTIFF while EMPLOYED by YOU.  
12

13 **Response:** Plaintiff initially was hired to work in the garment section of the Han Nam  
14 Market. She performed fittings and alterations of the garments. She sometimes worked as a  
15 sales clerk and cashier and after the garment section was closed she assisted in restocking,  
16 acted as a cashier and performed general clean up.  
17  
18

19 **INTERROGATORY NUMBER 11:** Please state ANY AND ALL FACTS that support YOUR  
20 first affirmative defense that PLAINTIFF's claims, or any of them, fail to state a claim upon which  
21 relief can be granted as alleged in YOUR Answer to PLAINTIFF's Complaint filed on December  
22 5, 2007.  
23

24 **Response:** Plaintiff's complaint fails to allege any facts or incidents which support a  
25 showing of any discriminatory animus on the basis of sex or race as alleged.  
26  
27  
28

1 **INTERROGATORY NUMBER 12:** Please state ANY AND ALL FACTS that support YOUR  
2 second affirmative defense that PLAINTIFF “voluntarily abandoned her employment with Han  
3 Nam in breach of her employment contract” as alleged in YOUR Answer to PLAINTIFF’s  
4 Complaint filed on December 5, 2007.  
5

6 **Response:** After being notified of Han Nam’s intent to close the garment section of its  
7 operations, and the decision not to renew her contract, plaintiff voluntarily abandoned her  
8 employment and did not return to work at Han Nam in breach of her employment contract.  
9

10  
11 **INTERROGATORY NUMBER 13:** Please state ANY AND ALL FACTS that support YOUR  
12 third affirmative defense that “neither gender nor ethnicity played any role in the decision not to  
13 renew plaintiff’s employment contract with Han Nam” as alleged in YOUR Answer to  
14 PLAINTIFF’s Complaint filed on December 5, 2007.  
15

16 **Response:** Ms. Jiang was hired to work in the Garment Section and was retained to  
17 make alterations and repairs to garments that were sold from the premises. Because the apparel  
18 division was not profitable, Han Nam decided to discontinue this line of operation in 2004.  
19 The decision not to renew her contract was based solely on a reasonable business decision to  
20 terminate an unsuccessful branch of the business operations. Issues related to plaintiff’s  
21 pregnancy, gender, race or other discriminatory animus took no part in Han Nam’s decision not  
22 to renew plaintiff’s employment contract. Han Nam had other employees who became  
23 pregnant and remained employees of Han Nam. Likewise, Han Nam employed other  
24 individuals of Chinese citizenship and ancestry and plaintiffs original complaint to the EEOC  
25 and then to the United States District Court is without factual foundation.  
26  
27  
28

1 **INTERROGATORY NUMBER 14:** Please state ANY AND ALL FACTS that support YOUR  
2 fourth affirmative defense that PLAINTIFF has unclean hands as alleged in YOUR Answer to  
3 PLAINTIFF'S Complaint filed on December 5, 2007.  
4

5 **Response:** Plaintiff made false accusations to the Equal Employment Opportunity  
6 Commission relative to her allegations of gender and race based discrimination. Plaintiff  
7 claimed that she was the only person of Chinese ethnicity who was employed by Han Nam,  
8 which was a statement which plaintiff knew to be false at the time she made it. Plaintiff has no  
9 valid claim of discrimination against Han Nam, but seeks to use such claims to extort money  
10 from Han Nam.  
11  
12

13  
14 **INTERROGATORY NUMBER 15:** Please state ANY AND ALL FACTS that support YOUR  
15 fifth affirmative defense that "Han Nam at all relevant times acted fairly, reasonably, justly and in  
16 good faith with respect to the plaintiff and in all dealings with its employees" as alleged in YOUR  
17 Answer to PLAINTIFF's Complaint filed on December 5, 2007.  
18

19 **Response:** See Answer to Interrogatory No. 8.  
20

21 **INTERROGATORY NUMBER 16:** Please state ANY AND ALL FACTS and other  
22 "discoverable information" that YOU believe is within the knowledge of Mr. Jun Soo Park (an  
23 individual identified in YOUR Rule 26(a)(1) disclosures) that is in any way RELATED TO this  
24 LAWSUIT and/or PLAINTIFF's claims herein.  
25

26 **Response:** Objection. Interrogatory is overly vague. Without waiving the objection,  
27 defendants incorporate the answer to Interrogatory 8 and 13.  
28

1 **INTERROGATORY NUMBER 17:** Please state ANY AND ALL FACTS and other  
2 “discoverable information” that YOU believe is within the knowledge of Mrs. Kim Yang Park (an  
3 individual identified in YOUR Rule 26(a)(1) disclosures) that is in any way RELATED TO this  
4 LAWSUIT and/or PLAINTIFF’s claims herein.  
5

6 **Response:** Objection. Interrogatory is overly vague. Without waiving the objection,  
7 defendants incorporate the answer to Interrogatory 8 and 13.  
8  
9

10 **INTERROGATORY NUMBER 18:** Please IDENTIFY any and all “Employees of Han Nam  
11 Market” (as identified in YOUR Rule 26(a)(1) disclosures) that have discoverable information that  
12 is in any way RELATED TO this LAWSUIT and/or PLAINTIFF’s claims herein.  
13

14 **Response:** Objection, without interviewing each and every employee of Han Nam Market  
15 employed during the period plaintiff’s employment it is impossible to determine whether they have  
16 discoverable information or not. Without waiving this objection, plaintiff incorporates exhibit 1  
17 in this response.  
18  
19

20 **INTERROGATORY NUMBER 19:** For each PERSON IDENTIFIED by YOU in response to  
21 Interrogatory Number 18, please state ANY AND ALL FACTS and other “discoverable  
22 information” that YOU believe is within the knowledge of each such PERSON that is in any way  
23 RELATED TO this LAWSUIT and/or PLAINTIFF’s claims herein.  
24

25 **Response:** Objection. Interrogatory is overly vague, ambiguous and unduly burdensome.  
26 Defendant is not obligated to interview or take statements from all of its employees to determine  
27 what knowledge they may have which might be “iin any way RELATED TO this LAWSUIT  
28



1 and/or PLAINTIFF'S claims. Notwithstanding this objection defendant incorporates its answers  
2 as set forth in the responses to interrogatories no.s 4, 5, 6, 8, 10, 12, and 13.  
3  
4

5 **INTERROGATORY NUMBER 20:** Please DESCRIBE IN DETAIL the relationship between  
6 YOU and Vienna Corporation.

7 **Response:** Han Nam Corporation are independent corporations but which have some  
8 common shareholders and directors. See the annual reports attached as Exhibits 5 and 6.  
9  
10

11 **INTERROGATORY NUMBER 21:** Please IDENTIFY the PERSON that translated for Mrs.  
12 Park during her December 8, 2004 discussion with PLAINTIFF wherein PLAINTIFF was told that  
13 she was not being renewed.  
14

15 **Response:** At the present time the name of the translator is unknown. Defendant  
16 believes that she is presently residing in China.  
17  
18

19 Dated this 29<sup>th</sup> day of February, 2008.  
20

21 The objections herein are the objections of the undersigned attorney and this validation of  
22 the objections is adopted for each Interrogatory herein.  
23  
24

25 \_\_\_\_\_  
26 /s/  
27 Stephen J. Nutting  
28 Attorney for Defendant

1 I swear that the answers given herein to the interrogatories are true to the best of my  
2 knowledge and belief.

3  
4  
5 \_\_\_\_\_/s/

6 Paek, Hyun Ho  
7 Manager, Han Nam Market  
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**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S FOR DECEMBER 2004**

	Name of Employee's	Categories	Citizenship
1.	Palacios, Vincent	Assistant Manager	US CNMI
2.	Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3.	Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4.	Zaman, Kamruz	Store Clerk	Bangladesh(Non-Alien IR)
5.	Soriano, Servillana	Commercial Cleaner	Filipino
6.	Baliton, Myrna	Cashier	Filipino
7.	Alcaide, Gil	Building Maintenance Repairer	Filipino
8.	Cho, Myung Hee	Manager	Korean
9.	Kim, Yang	Business Permit IR	Korean
10.	Limoico, Jeffry	Butcher	Filipino
11.	Gascon, Julieta	Commercial Cleaner	Filipino
12.	San Nicolas, Frances	Cashier	US CNMI
13.	Lee, Kwoan Hyung	Sales Manager	Korean
14.	Jiang, Zhai Lan	Dress Maker	Chinese
15.	Notario, Nelly	Sales Person	Filipino
16.	Delima, Nestor	Meat Cutter	Filipino
17.	Keller, Gayson Max	Store Clerk	US CNMI
18.	Abigania, Lester	Store Clerk	US CNMI
19.	Cui, Hai Jin	Commercial Cleaner	Chinese
20.	Piao, Shizhu	Supervisor Sales	Chinese
21.	Lactao, Eric	Sales Representative	Filipino
22.	Sundiam, Pee Jay	Commercial Cleaner	Filipino

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF NOVEMBER 16, 2007**

Name of Employee's	Categories	Citizenship
1. Palacios, Vincent	Assistant Manager	US CNMI
2. Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3. Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4. Soriano, Servillana	Commercial Cleaner	Filipino
5. Song, Keum Rye	Accountant	Korean
6. Alcaide, Gil	Building Maintenance Repairer	Filipino
7. Jin, Cheng Huan	Sales Supervisor	Chinese
8. Kim, Yang	Business Permit IR	Korean
9. Limoico, Jeffry	Butcher	Filipino
10. Gascon, Julieta	Commercial Cleaner	Filipino
11. San Nicolas, Frances	Cashier	US CNMI
12. Lee, Kwoan Hyung	Sales Manager	Korean
13. Sundiam, Amelita	Commercial Cleaner	Filipino
14. Notario, Nelly	Sales Person	Filipino
15. Santos, Jennifer	Cashier	US CNMI
16. Aldan, Judith	Cashier	US CNMI
17. Abigania, Llyod	Store Clerk	US CNMI
18. Chan, Bryan	Store Clerk	US CNMI
19. Lactao, Eric	Sales Representative	Filipino
20. Sundiam, Pee Jay	Commercial Cleaner	Filipino

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF JANUARY 31, 2008**

Name of Employee's	Categories	Citizenship
1. Palacios, Vincent	Assistant Manager	US CNMI
2. Lizama, Carol	Cashier	Filipino(Non-Alien IR)
3. Ahamed, Robayed	Store Clerk	Bangladesh(Non-Alien IR)
4. Soriano, Servillana	Commercial Cleaner	Filipino
5. Song, Keum Rye	Accountant	Korean
6. Alcaide, Gil	Building Maintenance Repairer	Filipino
7. Jin, Cheng Huan	Sales Supervisor	Chinese
8. Kim, Yang	Business Permit IR	Korean
9. Limoico, Jeffry	Butcher	Filipino
10. Gascon, Julieta	Commercial Cleaner	Filipino
11. San Nicolas, Frances	Cashier	US CNMI
12. Lee, Kwoan Hyung	Sales Manager	Korean
13. Sundiam, Amelita	Commercial Cleaner	Filipino
14. Notario, Nelly	Sales Person	Filipino
15. Koshiba, Lynette	Cashier	US CNMI
16. Aldan, Judith	Cashier	US CNMI
17. Abigania, Llyod	Store Clerk	US CNMI
18. Chan, Bryan	Store Clerk	US CNMI
19. Lactao, Eric	Sales Representative	Filipino
20. Suda, Seriko	Store Clerk	US CNMI

**HAN NAM CORPORATION**  
**LIST OF EMPLOYEE'S AS OF 01/05 TO 01/08**

*New Hire.*

	Name of Employee's	Categories	Citizenship
1.	Song, Keum Rye	Accountant	Korean <i>Feb 2005</i>
2.	Jin, Cheng Huan	Sales Supervisor	Chinese <i>Dec. 2006</i>
3.	Cabrera, Andrea Dee	Cashier	US CNMI <i>June, 2005</i>
4.	Taitano, Michael	Store Clerk	US CNMI <i>Oct, 2005</i>
5.	Taisacan, Mario	Store Clerk	US CNMI <i>Nov. 2005</i>
6.	Santos, Jennifer	Cashier	US CNMI <i>Nov. 2007</i>
7.	Hockett Jadine	Cashier	US CNMI <i>Nov. 2006</i>
8.	Sundiam, Amelita	Commercial Cleaner	Filipino <i>April, 2005</i>
9.	Park, Gyu Ha	General Manager	Korean <i>June 2006</i>
10.	Koshiha, Lynette	Cashier	US CNMI <i>Dec. 2007</i>
11.	Aldan, Judith	Cashier	US CNMI <i>June 2006</i>
12.	Abigania, Llyod	Store Clerk	US CNMI <i>Oct. 2006</i>
13.	Chan, Bryan	Store Clerk	US CNMI <i>Sept. 2007</i>
14.	Aldan, Edith	Cashier	US CNMI <i>March 2007</i>
15.	Suda, Seriko	Store Clerk	US CNMI <i>Jan. 2008</i>

EXHIBIT 4

## ANNUAL CORPORATION REPORT

Filing Fee \$50.00 / Make Check Payable to: CNMI TREASURER  
File Original and Two Copies

**FILING:** THE INITIAL REPORT MUST BE FILED WITHIN 60 DAYS OF INCORPORATION.  
ANNUAL REPORT MUST BE FILED ON OR BEFORE MARCH 1<sup>ST</sup> OF EACH YEAR.

**FILE WITH:** REGISTRAR OF CORPORATIONS  
Department of Commerce  
2<sup>nd</sup> Floor, Joeten Dandan Building Room 27  
Caller Box 10007  
Saipan, MP 96950

**INITIAL REPORT:** \_\_\_\_\_ **REPORT FOR THE YEAR** 2006  
**CHECK ONE:** (XX) Domestic Corporation ( ) Foreign Corporation

2007 JUN 25 AM 8:30  
*[Signature]*

#1019119

<b>Name, Mailing Address &amp; Telephone No. of Corporation:</b> (Attach map showing location if address is only a P. O. Box)																	
HAN NAM CORPORATION PMB 385 P.O.BOX 10001 SAIPAN MP 96950																	
<b>Telephone Number:</b> 288-9290 LOCATION: KOBLERVILLE																	
<b>Name, Mailing Address &amp; Telephone No. of Registered Agent:</b> (Attach Map showing location if address is only a P. O. Box)																	
KIM, YANG PMB 385 P.O.BOX 10001 SAIPAN MP 96950																	
<b>Telephone Number:</b> 288-9290																	
<b>LIST OF DIRECTORS:</b>																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Name</th> <th style="text-align: left;">Nationality</th> <th style="text-align: left;">Address</th> </tr> </thead> <tbody> <tr> <td>PARK, JUN SOO</td> <td>KOREAN</td> <td>PMB 385 P.O.BOX 10001 SAIPAN MP 96950</td> </tr> <tr> <td>KIM, YOUNG JONG</td> <td>KOREAN</td> <td>PMB 385 P.O.BOX 10001 SAIPAN MP 96950</td> </tr> <tr> <td>KIM, YANG</td> <td>KOREAN</td> <td>PMB 385 P.O.BOX 10001 SAIPAN MP 96950</td> </tr> </tbody> </table>	Name	Nationality	Address	PARK, JUN SOO	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950	KIM, YOUNG JONG	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950	KIM, YANG	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950					
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<b>LIST OF OFFICERS:</b>																	
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PARK, JUN SOO	PRESIDENT/TREAS.	KOREAN	SAME AS ABOVE														
KIM, YOUNG JONG	VICE PRESIDENT	KOREAN	SAME AS ABOVE														
KIM, YANG	SECRETARY	KOREAN	SAME AS ABOVE														
<b>DESCRIPTION OF BUSINESS ACTIVITIES - List all lines of business:</b> RETAIL CLOTHING STORE, WHOLESALE GENERAL MERCHANDISE, RETAIL GENERAL MERCHANDISE, IMPORT/EXPORT (EXCEPT GARMENTS) MANUFACTURE..																	
<b>STOCK ISSUED AND OUTSTANDING:</b>																	
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Number of Shares</th> <th style="text-align: left;">Class of Shares</th> <th style="text-align: left;">Amount Paid for Shares</th> </tr> </thead> <tbody> <tr> <td>350 SHARES</td> <td>COMMON STOCK</td> <td>\$350,000.00</td> </tr> </tbody> </table>	Number of Shares	Class of Shares	Amount Paid for Shares	350 SHARES	COMMON STOCK	\$350,000.00											
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NAME OF SHAREHOLDERS	IMMIGRATION STATUS	NATIONALITY	NUMBER OF SHARES HELD														
PARK, JUN SOO	BUSINESS	KOREAN	250,000 SH														
KIM, YOUNG JONG	STAYING IN KOREA	KOREAN	50,000 SH														
KIM, YANG	I.R.	KOREAN	50,000 SH														
<b>Signature:</b> <i>[Signature]</i> _____ PRINT NAME & TITLE OF PERSON SIGNING (Must be Director or Officer of the Corporation.)																	
<b>Date:</b> <u>6/1/07</u>																	

EXHIBIT 5

DEPT. OF COMMERCE

## ANNUAL CORPORATION REPORT

Filing Fee \$50.00 / Make Check Payable to: CNMI TREASURER  
File Original and Two Copies

3:10p  
SEP 04 2007

FILING: THE INITIAL REPORT MUST BE FILED WITHIN 60 DAYS OF INCORPORATION.  
ANNUAL REPORT MUST BE FILED ON OR BEFORE MARCH 1<sup>ST</sup> OF EACH YEAR.

FILE WITH: REGISTRAR OF CORPORATIONS  
Department of Commerce  
2<sup>nd</sup> Floor, Joeten Dandan Building Room 27  
Caller Box 10007  
Saipan, MP 96950

Registrar of Corporations  
Commonwealth of the  
Northern Mariana Islands

INITIAL REPORT: \_\_\_\_\_ REPORT FOR THE YEAR 2006  
CHECK ONE: (X) Domestic Corporation ( ) Foreign Corporation

Name, Mailing Address & Telephone No. of Corporation: (Attach map showing location if address is only a P. O. Box)

VIENNA CORPORATION  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950

Telephone Number: 256-8949  
LOCATION: GARAPAN

Name, Mailing Address & Telephone No. of Registered Agent: (Attach Map showing location if address is only a P. O. Box)

PARK, JUN SOO  
PMB 385 P.O.BOX 10001  
SAIPAN MP 96950

Telephone Number: 288-9290

## LIST OF DIRECTORS:

Name	Nationality	Address
PARK, JUN SOO	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950
KIM, YANG	KOREAN	PMB 385 P.O.BOX 10001 SAIPAN MP 96950

## LIST OF OFFICERS:

Name	Position	Nationality	Address
PARK, JUN SOO	PRESIDENT/TREASURER	KOREAN	SAME AS ABOVE
KIM, YANG	VICE-PRESIDENT/SECRETARY	KOREAN	SAME AS ABOVE

## DESCRIPTION OF BUSINESS ACTIVITIES - List all lines of business:

RETAIL GENERAL MERCHANDISE/WHOLESALE GENERAL MERCHANDISE

## STOCK ISSUED AND OUTSTANDING:

Number of Shares	Class of Shares	Amount Paid for Shares
2,500 SH	COMMON STOCK	US\$250,000.00
NAME OF SHAREHOLDERS	IMMIGRATION STATUS	NATIONALITY
PARK, JUN SOO	BUSINESS	KOREAN
KIM, YANG	I.R.	KOREAN
		NUMBER OF SHARES HELD
		2,000 SH
		500 SH

Signature:

Date: 09/04/07

PARK, JUN SOO / PRESIDENT  
PRINT NAME & TITLE OF PERSON SIGNING  
(Must be Director or Officer of the Corporation.)

EXHIBIT 6